

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
W.R. GRACE & CO., <u>et al.</u> ,	)	Case No. 01-01139 (JKF)
Debtors.	)	(Jointly Administered)
	)	<b>Objection Deadline: Sept. 7, 2007</b>
	)	<b>Hearing Date: Sept. 24, 2007 @ 2:00 pm</b>

**NOTICE OF MOTION**

David T. Austern, the Court-appointed legal representative for future asbestos personal injury claimants (the "FCR"), together with the Debtors,<sup>1</sup> the Official Committee of Equity Security Holders, the Official Committee of Unsecured Creditors, the Official Committee of Asbestos Personal Injury Claimants, the Official Committee of Asbestos Property Damage Claimants, and counsel to the Libby Claimants (collectively with the FCR, the "Parties"), filed the *Agreed Motion of the Future Claimants' Representative, the Debtors, the Official Committees, and Counsel to the Libby Claimants for Entry of Consent Order Concerning Confidentiality of Documents and Information to Be Produced by Expert Witness for Future Claimants' Representative* (the "Agreed Motion") [Docket No. 16596] on August 20, 2007.

You are required to file a response to this Motion on or before September 7, 2007.

At the same time, you are required to copy of the response upon the following counsel:

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<sup>1</sup> The "Debtors" refers collectively to W.R. Grace & Co., *et al.*

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HEARING ON THE APPLICATION IS SCHEDULED FOR SEPTEMBER 24, 2007 AT  
2:00 P.M. BEFORE THE HONORABLE JUDITH K. FITZGERALD, U.S. BANKRUPTCY  
COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET,  
WILMINGTON, DELAWARE 19801.

Dated: August 22, 2007

Respectfully submitted,  
PHILLIPS, GOLDMAN & SPENCE, P.A.

  
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*Counsel for David T. Austern,  
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